

# **Exhibit 2**

STEVEN D. MANNING  
DENNIS B. KASS  
ANTHONY J. ELLROD  
EUGENE P. RAMIREZ  
FREDRIC W. TRESTER  
LAWRENCE D. ESTEN  
MILDRED K. O'LINN\*  
ALFRED M. DE LA CRUZ  
ERWIN A. NEPOMUCENO  
BRIAN T. MOSS\*  
JEFFREY M. LENKOV  
MARGUERITE L. JONAK\*  
JOHN D. MARINO  
MICHAEL L. SMITH  
LOUIS W. PAPPAS  
SHARI L. ROSENTHAL  
EUGENE J. EGAN  
CLIFFORD A. CLANCEY  
RINAT B. KLIER-ERLICH  
ROBERT B. ZELMS†  
R. ADAM ELLISON  
SCOTT WM. DAVENPORT  
JASON J. MOLNAR\*  
DAVID V. ROTH  
JENNIFER L. SUPMAN  
KATHLEEN A. HUNT\*  
STEVEN J. RENICK  
JAMES E. GIBBONS  
DANIEL B. HERBERT\*  
MARK A. HAGOPIAN  
SUZIE ZACHAR IRWIN†  
DONALD R. DAY\*  
D. HIEP TRUONG  
MICHAEL A. WEISMANTEL  
JANET D. JOHN\*  
JOHN M. HOCHHAUSLER  
ANTHONY S. VITAGLIANO†  
KEVIN H. LOUTH  
SHARON S. JEFFREY  
KEITH RICKER†  
JOHN M. COWDEN\*  
DAVID R. REEDER\*  
TOBY D. BUCHANAN  
LADELL H. MUHLESTEIN

SEVAN GOBEL  
RICHARD G. GARCIA  
DEBORA VERDIER†  
JEANETTE DIXON  
KENNETH S. KAWABATA  
STEVEN AMUNDSON\*  
RICHARD MACK†  
TONY M. SAIN  
MARILYN R. VICTOR\*  
MARTIN HOLLY  
MINAS SAMUELIAN  
MATTHEW P. NOEL  
LALO GARCIA  
GENE W. LEE  
CHRISTOPHER DATOMI  
ANTHONY CANNIZZO  
GARY POPHAM JR.  
MAIJA OLIVIA\*  
JONATHAN J. LABRUM\*  
JONATHAN D. SAYRE  
KAREN LIAO  
ANDY J. SEMOTIUK\*  
JULIE M. FLEMING  
ROBERT E. MURPHY\*  
NINA RICCI FRANCISCO  
DONALD R. BECK  
FRANK M. LA FLEUR  
ROBERT P. WARGO\*  
SCOTT A. ALLES†  
MAHASTI KASHEFI  
LISA WONG  
DONALD APPELEGATE  
HEATHER M. ANTONIE  
JASON J. DOSHI  
ZUBIN FARINPOUR  
LAURA MCADAMS  
GRETCHEN COLLIN  
RODRIGO J. BOZOGHLIAN  
ANGELA M. POWELL  
D. ROCKEY GOODSELL III\*  
JENIFER WALLIS\*  
MATTHEW E. KEARL  
JUSTIN SHERGILL  
NARINE AVANES

# MANNING & KASS ELLROD, RAMIREZ, TRESTER LLP

ATTORNEYS AT LAW



15TH FLOOR AT 801 TOWER  
801 SOUTH FIGUEROA STREET  
LOS ANGELES, CALIFORNIA 90017-3012  
TELEPHONE: (213) 624-6900  
FACSIMILE: (213) 624-6999  
WEB SITE: WWW.MANNINGLLP.COM

July 30, 2018

BRIAN BABAKHANIAN  
ADAM ROEHRICK  
TONYA N. MORA  
EMILY EDWARDS  
JESI WOLNIK  
FATIMA BADREDDINE  
DANIEL SULLIVAN  
HILA GOLCHET  
MARYAM MALEKI  
MICHAEL COOPER  
PAUL MITTELSTADT  
NICOLE THRELKEL  
A. FOSTER SHI  
MAE ALBERTO  
MICHAEL KYYAT  
BRIAN SMITH  
GREGORY LEWIS  
JUDSON H. PRICE  
JORDON FERGUSON\*  
PAUL HARSHAW  
VICTORIA KAJO  
ANDREA KORNBLOU  
ARA BAGHDASSARIAN  
ANTHONY WERBIN  
MICHAEL WATTS  
TRISHA NEWMAN  
NISHAN WILDE  
LYNN CARPENTER  
JEFFREY FISHKIN  
LYNNELL D. DAVIS  
DAVID R. RUIZ  
NATALYA VASYUK  
JESSICA ROSEN  
ANDREEA CUSTUREA  
NATHAN GROSCH  
LINNA LOANGKOTE  
KAVEH HOSSEINI  
ASHLEY ROLAND  
DERIK SARKESIAN  
SUZANNE FRIAS  
DANIEL DUBIN  
KATHERINE AGBAYANI  
MARK WILSON  
JENNY PAK

ELIZABETH HANDELIN  
CRAIG SMITH  
KARLY K. WHITE  
MATTHEW P. OPPEN  
GARRICK P. VANDERFIN  
ALEXANDRA RAMBIS  
SHAWHEEN SHAFIZADEH  
KELSEY NICOLAISEN  
ASHTON MCKINNON  
FAROUK MANSOUR  
KIRSTEN BROWN  
ROBERT DAVIS  
JOSEPH CORIATY  
NATALIE ORTIZ  
JAMILEH HAWATMEH  
JEFFREY TSAO  
ERIN N. COLLINS  
JESSICA SPINOLA  
ROBERT W. LAWTON  
TIFFANY HENDERSON  
JONATHAN HACK  
DAVID BREITBURG  
EMILY ELLSE  
LAWTON JACKSON  
TODD LEZON  
JEAN CHA  
JEFFREY KORN  
CURTIS GOLE  
RICK MARTIN  
ERIC WAHRBURG  
CAROL TREASURE  
R. SCOTT HARLAN  
ALDWIN TANALA

## OF COUNSEL ARI MARKOW

\* Admitted in Multiple Jurisdiction  
† Admitted to Practice Law in  
Arizona only  
‡ Admitted to Practice Law in  
Alabama

## VIA E-MAIL AND U.S. MAIL

Mr. Steven R. Pounian  
Kreindler & Kreindler, LLP  
750 Third Ave.  
New York, NY 10017  
E-Mail: [spounian@kreindler.com](mailto:spounian@kreindler.com)

Re: **In re: Terrorist Attack on 9/11/2001**

Our File No.: : 7037-70000

Dear Mr. Pounian:

The enclosed records complete your request from the King Fahad Mosque, a/k/a Islamic Foundation of Shaikh Ibn Taymiyah, subject to the objections below. We are happy to meet and confer with you regarding our responses.

## Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action, Attachment A

## GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION

Responding Party generally objects to the Subpoena to Produce Documents as follows:

DALLAS  
1717 McKinney Ave., Suite 700  
Dallas, TX 75202-1241  
Telephone: (214) 953-7669

NEW YORK  
One Battery Park Plaza, 4th Floor  
New York, NY 10004  
Telephone: (212) 858-7769

ORANGE COUNTY  
19800 MacArthur Blvd., Suite 900  
Irvine, CA 92612  
Telephone: (949) 440-6669

PHOENIX  
3636 North Central Avenue, 11th  
Floor  
Phoenix, AZ 85012  
Telephone: (602) 313-5469

SAN DIEGO  
225 Broadway, Suite 1200  
San Diego, CA 92101  
Telephone: (619) 515-0269

SAN FRANCISCO  
333 Bush Street, 27th Floor  
San Francisco, CA 94104  
Telephone: (415) 217-6990

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 2

1. Responding Party objects generally to the Requests for Production to the extent that they seek to elicit information that is neither relevant to the subject matter of this action, nor reasonably calculated to lead to the discovery of admissible evidence;
2. Responding Party objects generally to the Requests for Production to the extent that they are unreasonably overbroad in scope, and thus burdensome and oppressive, in that each such request seeks information pertaining to items and matters that are not relevant to the subject matter of this action, or, if relevant, so remote therefrom as to make its disclosure of little or no practical benefit to Propounding Parties, while placing a wholly unwarranted burden and expense on Responding Party in locating, reviewing and producing the requested information;
3. Responding Party objects generally to the Requests for Production to the extent that they are burdensome and oppressive, in that ascertaining the information necessary to respond to them, and to produce documents in accordance therewith, would require the review and compilation of information from multiple locations, and voluminous records and files, thereby involving substantial time of employees of Responding Party and great expense to Responding Party, whereas the information sought to be obtained by Propounding Parties would be of little use or benefit to Propounding Parties;
4. Responding Party objects generally to the Requests for Production to the extent that they are vague, uncertain, overbroad, and without limitation as to time or specific subject matter;
5. Responding Party objects generally to the Requests for Production to the extent that they seek information at least some of which is protected by the attorney-client privilege or the attorney work-product doctrine, or both;
6. Responding Party objects generally to the Requests for Production to the extent that they seek to have Responding Party furnish information and identify documents that are proprietary to Responding Party and contain confidential information.

Without waiver of the foregoing, Responding Party further responds as follows:

**Documents to be Produced**

**Request No. 1**

1. Regarding Fahad Thumairy, produce documents comprising and concerning:
  - a. his appointment, title(s), activities and responsibilities at the King Fahad Mosque during the applicable time period;
  - b. his pay, pay increases, awards, bonuses, stipends and allowances from January 1, 1998 through and including 2003;

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 3

- c. his performance reviews during the applicable time period;
- d. his sermons, speeches and writings during the applicable time period;
- e. the instructions or directions provided by him by the King Fahad Mosque during the applicable time period;
- f. the funds and resources under his control at the King Fahad Mosque during the applicable time period;
- g. his responsibilities for the finances of the King Fahad Mosque during the applicable time period;
- h. his superiors and supervisors at the King Fahad Mosque during the applicable time period;
- i. his assistants or other persons under his supervision or oversight at the King Fahad Mosque during the applicable time period;
- j. his phone, fax and email records at the King Fahad Mosque during the applicable time period;
- k. King Fahad Mosque board meetings attended by Thumairy during the applicable time period;
- l. his calendar and/or record of his activities at the King Fahad Mosque during the applicable time period;
- m. any weddings that Thumairy performed at the King Fahad Mosque during the applicable time period;
- n. disciplinary measures at any time, including but not limited to that "the leadership of the [King Fahad Mosque] attempted to discipline him [Thumairy] in the summer of 2002 and early 2003 for espousing extremist views" as stated in the 9/11 Commission Report, p. 515 n. 13; and
- o. investigations conducted at any time concerning money transfers, Nawaf al Hazmi and Khalid al Mihdhar, or Thumairy's ties to extremist, including but not limited to "a particularly radical faction" at the King Fahad Mosque and "terrorist activity" (as set forth in the 9/11 Commission Report, p. 216-7) and/or al Qaeda.

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 4

**Response to Request No. 1**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: To the extent that this request seeks production of responsive unprivileged items, such documents are produced herewith.

**Request No. 2**

2. Regarding any person other than Thumairy who was employed at the Los Angeles Consulate and simultaneously was an imam or held another position or title at the King Fahad Mosque at any time during the applicable time period, produce documents concerning;

a. his appointment, title(s), activities and responsibilities at the King Fahad Mosque during the applicable time period;

b. his pay, pay increases, awards, bonuses, stipends and allowances from January 1, 1998 through and including 2003;

c. his performance reviews during the applicable time period;

d. his sermons, speeches and writings during the applicable time period;

e. the instructions or directions provided by him by the King Fahad Mosque during the applicable time period;

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 5

f. the funds and resources under his control at the King Fahad Mosque during the applicable time period;

g. his responsibilities for the finances of the King Fahad Mosque during the applicable time period;

h. his superiors and supervisors at the King Fahad Mosque during the applicable time period;

i. his assistants or other persons under his supervision or oversight at the King Fahad Mosque during the applicable time period;

j. his phone, fax and email records at the King Fahad Mosque during the applicable time period;

k. King Fahad Mosque board meetings attended by the person during the applicable time period; and

l. his calendar and/or record of his activities at the King Fahad Mosque during the applicable time period.

**Response to Request No. 2**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 6

inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request.

**Request No. 3**

3. Documents concerning any and all communications, financial dealings, meetings, visits or activities between the King Fahad Mosque and any of the following individuals during the applicable time period:

- a. Khalid al Mihdhar
- b. Nawaf al Hazmi
- c. Hani Hanjour
- d. Omar Ahmed al Bayoumi
- e. Mohdhar Abdullah
- f. Caysan Bin Don a.k.a. Isamu Dyson a.k.a. Clayton Morgan
- g. Oualid Benomrane
- h. Omar Abdi Mohamed
- i. Anwar al Aulaqi
- j. Hasan Abukar
- k. Osama "Sam" Mustafa
- i. Ziyad Khreiwesh

**Response to Request No. 3**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.



Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 7

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request, nor was there any contact between responding party and any of the individuals listed in this request.

**Request No. 4**

4. Documents concerning any and all communications, financial dealings, meetings, visits or activities between the King Fahad Mosque and any of the following organizations during the applicable time period:

- a. Islamic Center of San Diego
- b. Al-RRIBAT AL-ISLAMI (located on Saranac Street, San Diego, CA)
- e. Al Haramain Islamic Foundation
- d. Global Relief Foundation
- e. Western Somali Relief Organization
- f. Al Barakaat
- g. Dahabshil
- h. Muslim World League

**Response to Request No. 4**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-



Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 8

client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request. Responding party also responds that there have been no communications with any of the above-listed organizations.

**Request No. 5**

5. Produce documents concerning communications, financial dealings, meetings, visits or activities between the King Fahad Mosque and any persons working for or on behalf of any of the following Saudi government offices during the applicable time period:

- a. the Ministry of Islamic Affairs
- b. the Saudi Embassy
- c. the Saudi Consulate in Los Angeles

**Response to Request No. 5**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 9

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: To the extent that this request seeks production of responsive unprivileged items, such documents are produced herewith.

**Request No. 6**

6. Produce documents concerning any visit(s) of the Saudi Minister of Islamic Affairs to California during the applicable time period, including but limited to any contacts, communications and meetings with Thumairy and/or Omar Ahmed al Bayoumi.

**Response to Request No. 6**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request, nor is responding party aware of any connection between itself and the entities listed in this request.

**Request No. 7**

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 10

7. Produce documents concerning the financial relationship between the King Fahad Mosque and the Kingdom of Saudi Arabia during the applicable lime period.

**Response to Request No. 7**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: To the extent that this request seeks production of responsive unprivileged items, such documents are produced herewith.

**Request No. 8**

8. Produce documents concerning lodging or lodging reservations in December 1999, January 2000 or February 2000 at any location in California including but not limited to:(a) hotels in the vicinity of the Los Angeles International Airport, the King Fahad Mosque or the Saudi Consulate in Los Angeles, including but not limited to (1) the Travelodge located at or near 11180 Washington Place, Culver City, CA, (ii) the Halfmoon Motel located at or near 3958 S. Sepulveda Ave., Culver City, CA, and (iii) the Deano's Motel located at or near 3868 S. Sepulveda Ave., Culver City, CA; and (b) rentals at the Avalon Westside Apartments in Los Angeles made or arranged by any person, including but not limited to Thumairy, who held a work, volunteer or other position at the King Fahad Mosque.

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 11

**Response to Request No. 8**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request. It is the policy of the King Fahad Mosque to make no hotel arrangements for any person.

**Request No. 9**

9. Produce documents concerning the use of any drivers, including but not limited to taxi, livery, private persons and/or volunteers, by or on behalf of the King Fahad Mosque from December 1, 1999 through and including December 31, 2000.

**Response to Request No. 9**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 12

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request.

**Request No. 10**

10. Produce documents concerning expenses incurred for any transportation provided by or on behalf of the King Fahad Mosque, including but not limited to picking up or dropping off persons at the Los Angeles International Airport, from December 1, 1999 through and including December 31, 2000.

**Response to Request No. 10**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 13

inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request.

**Request No. 11**

11. Produce documents containing a list of the persons serving on the Board of Directors of the King Fahad Mosque during the applicable time period and for each person on the Board of Directors, produce documents concerning their work experience, background and their relationship with the Kingdom of Saudi Arabia.

**Response to Request No. 11**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence. Specifically, several members of the Board of Directors are Saudi citizens. It is unduly burdensome, harassing and unreasonable to expect them to produce all documents concerning their relationship and background with the Kingdom of Saudi Arabia.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: To the extent that this request seeks production of responsive unprivileged items, such documents are produced herewith.

Responding Party is willing to meet and confer regarding this request.

**Request No. 12**



Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 14

12. Produce documents containing a list of propagators working for the Ministry of Islamic Affairs in the United States during the applicable time period.

**Response to Request No. 12**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request.

**Request No. 13**

13. Produce documents concerning the conference and/or meeting of propagators organized, funded and/or attended by the Saudi Embassy, the Saudi Consulate in Los Angeles and/or Ministry of Islamic Affairs and held in Los Angeles in July 1999.

**Response to Request No. 13**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional



Mr. Steven R. Pounian

Re: **In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 15

right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request. To the extent that responding party understands this request, responding party responds that no such event occurred.

#### **Request No. 14**

14. Produce documents containing a list of the persons, together with their home and home addresses, who were visiting scholars at the King Fahad Mosque during the applicable time period.

#### **Response to Request No. 14**

OBJECTION: Responding Party incorporates by reference here each of the objections stated in the General Objections section, *supra*.

PRIVACY: As phrased, this request potentially calls for the production of documents or information that is privileged from disclosure under the federal and California constitutional right to privacy, including the privacy rights of third parties, and/or – in light of its broad phrasing so as to potentially include responding party's attorneys– potentially including the attorney-client privilege (including but not limited to its investigative aspect) and/or the attorney work product protection.

ATTORNEY-CLIENT PRIVILEGE / WORK PRODUCT PRIVILEGE: As phrased, this request potentially calls for the production of documents or information that includes attorney-client privilege information (including but not limited to its investigative aspect) and/or the attorney work product protection.

Mr. Steven R. Pounian

**Re: In re: Terrorist Attack on 9/11/2001**

July 30, 2018

Page 16

VAGUE, OVERBROAD AND COMPOUND: This request is also vague, overbroad, compound, without limitation as to specific subject matter and unduly burdensome as phrased, and is therefore not likely to lead to admissible evidence.

Notwithstanding and without waiving the foregoing objections, and to the extent the responding party understands the request, responding party responds as follows: After a diligent inquiry and reasonable search of the records and the items within responding party's possession, custody or control, responding party does not possess any documents responsive to this request. To the extent that responding party understands this request, responding party does not keep lists regarding visiting speakers or other persons.

Please do not hesitate to contact us regarding these responses. Thank you.

Very truly yours,

**MANNING & KASS  
ELLROD, RAMIREZ, TRESTER LLP**



Eugene P. Ramirez, Esq.  
Michael Watts, Esq.

EPR/MRW

cc: Mr. Andrew Shen